

**REMARKS**

Claims 1-17 are pending in the application. Of the claims, Claims 1, 5, 9, and 13 are independent claims. Claims 9 and 10 have been amended. No new matter has been introduced by way of these amendments.

**Regarding 35 U.S.C. § 112, paragraph 2 Rejection**

Claims 9-12 stand rejected under 35 U.S.C. § 112, second paragraph due to insufficient antecedent basis. Claims 9 and 10 are being amended to correct the antecedent basis problem. In particular, claim 9 is being amended to replace "the second subtree root node" with "a second subtree root node". Similarly, Claim 10 is being amended to replace "the memory " with "memory".

Accordingly, Applicant respectfully requests that, in view of these amendments, the rejection under 35 U.S.C. § 112, second paragraph of claims 9 and 10 be withdrawn. Since claims 11 and 12 are rejected based on their dependency of claim 9, they too are believed to be in condition for allowance.

**Regarding 102(e) Rejection**

Claims 1, 3-5, 7-9, and 11-17 are rejected under 35 U.S.C. 102(e) as being anticipated by Tzeng (U. S. Patent No. 6,067,574).

Before discussing the cited references, however, a brief review of the Applicant's disclosure may be helpful. The Applicant's disclosed invention is directed to a method for updating a lookup table. Access is provided to a first set of routes stored in nodes of a first subtree where the first subtree is accessed by a first pointer to the first subtree's root node. A second set of routes is stored in nodes of a second subtree where the second subtree is accessed by a second pointer to the second subtree's root node. While the second set of routes is stored, the first set of routes remains accessible using the first pointer to the first subtree's root node. Access is then switched from the first subtree to the second subtree by replacing the first pointer with the second pointer. (See Applicant's specification page 5, lines 1-5; page 45, line 7 – page 47, line 22; Fig. 23 and Fig. 25.)

In contrast, the cited reference, Tzeng discloses a traditional prefix tree structure that may be partitioned into multiple trees in such a way as to allow compression. In particular, Tzeng uses a Prefix Tree Compression Algorithm to compress prefix trees. During operation, the Prefix Tree Compression Algorithm stores a root node of a prefix tree in a memory device (C). Next (step 3A), Tzeng removes the root node (e.g., the first node) of the prefix tree and stores a compressed subtree (step 3B). (See Tzeng, col. 5, lines 55-63; col. 8, lines 1-35.) However, once Tzeng removes the root node (step 3A), the root node can no longer be accessed. Therefore, the removed root node is not accessible when storing the compressed subtree (step 3B). Thus, this is not the same as Applicant's invention that allows access to the root node while storing a set of routes because Tzeng removes the root node prior to storing.

Accordingly, Tzeng does not disclose "*storing a second set of routes stored in nodes of a second subtree, the second subtree being accessed through a second pointer to a second subtree root node, while access is provided to the first set of routes stored in the first subtree by the first pointer*" as claimed by the Applicant in Claim 1.

Independent claims 5, 9 and 13 include similar limitations and, therefore, should be allowed for similar reasons over Tseng under 35 U.S.C. 102(e).

Claims 3-4 are dependent on independent Claim 1, Claims 7-8 are dependent on independent Claim 5, Claims 11-12 are dependent on independent Claim 9 and Claims 14-17 are dependent on independent Claim 13. Accordingly, these claims should be found in allowable condition for at least the same reasons presented above.

Accordingly the rejection of claims 1, 3-5, 7-9, and 11-17 under §102(e) is believed to be improper.

#### Regarding 35 U.S.C. § 103(a) Rejection

Claims 2, 6 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Tzeng in view of Nakatsu et al. (U.S. Patent No. 5,787,151).

Because these claims depend from independent claims, the same arguments presented above apply. Since Tzeng does not teach, suggest, or otherwise provide motivation for the independent claims ("*storing a second set of routes stored in nodes of a second subtree, the second subtree being accessed through a second pointer to a second subtree root node, while*

*access is provided to the first set of routes stored in the first subtree by the first pointer*”), dependent Claims 2, 6, and 10 should be allowable under 35 U.S.C. 103(a) against Tzeng for at least the same reasons presented above.

**CONCLUSION**

In view of the above amendments and remarks, it is believed that all claims (claims 1-17) are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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